STATE OF COLORADO

Bill Owens, Governor Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Laboratory and Radiation Services Division 8100 Lowry Blvd. Denver, Colorado 80230-6928 (303) 692-3090 Colorado Department
of Public Health
and Environment

September 16, 2002

Ms. Carol Deck, Esq. Kaiser-Hill Company, LLC Rocky Flats Environmental Technology Site 10808 Hwy. 93, Unit B Golden, Colorado 80403-8200

Dear Ms. Deck:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (Division) has reviewed the Closure Plan (Plan) for the New Sanitary Landfill at Rocky Flats Environmental Technology Site (RFETS) dated September 5, 2002. This document was submitted as a revision of the original plan dated January 28, 2002 for closure of the unused landfill at RFETS, which addresses and responds to issues brought up by Division personnel. The activities outlined in the closure plan addresses the landfill area, the associated leachate pond, and the below grade piping for the leachate collection system.

The Division is reviewing the Plan with a focus on bringing the landfill site toward closure and to determine if the plan complies with applicable Solid Waste Regulations, 6 CCR 1007-2. Based upon review of the material submitted the Division request the following issues be incorporated into a final version of the Plan.

- In lieu of a full closure with a prescribed cover as described in Section 3.5 of 6 CCR 1007-2; Regulations Pertaining to Solid Waste Disposal Sites and Facilities please provide details within the Plan indicating that all liner materials, piping and other deleterious materials will be removed within three (3) feet of the existing surface.
- Details of the removal or desiccation of the PVC and clay shall indicate that the final materials if left in place will not inhibit free flow of surface and groundwater. We believe that the PVC liner, if shredded, should not overlap in any areas and that the material should be cut into manageable strips and disked into the ground. This material shall also be buried three (3) feet below ground surface.
- Please indicate in the closure plan that revegetation efforts will be compatible with the surrounding undisturbed vegetation and with the US FWS plans for the area.

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• Please indicate that Division personnel will be notified of each phase of closure activities and that an opportunity to inspect the site will be made available to Division staff prior to burial of any material.

This information is considered to be integral to the Closure Plan activities that should be clearly described in the plan. Accordingly, the Division cannot provide a formal approval to the Plan until the requested information is submitted.

Although the Division does not impose a fee at the time of submittal, there will be a charge for staff time spent on reviewing the Plan and preparing the final documentation. Currently the charge is \$72.47 per hour. An invoice will be sent to the applicant upon completion of the review.

Should you have questions or comments regarding this letter you may reach me at (303) 692-3349.

Sincerely,

Darrell R. Dearborn

Geologist, Solid Waste Unit

Compliance Program

Glenn F. Mallory

Solid Waste Unit Leader

Compliance Program

cc: Roy Laws, JCDHE

Jefferson County Board of Commissioners

David Kruchek, CDPHE

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